



Peat, Marwick, Mitchell & Co.

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January 11, 1983

Ms. Vicky Keramida, Ph.D.
Project Manager
Pretreatment Program
Department of Public Works
2460 City-County Building
Indianapolis, IN 46204

Dear Ms. Keramida:

Enclosed please find our monthly project status report for December 1982. The following items are of particular interest to you and the management of the Department of Public Works.

- . The technical aspects of the project are nearing completion with the final ordinance numbers expected to be published in January by James Montgomery.
- . Since Congress did not address the Pretreatment Waiver Provision for Municipalities we will continue to design the City of Indianapolis Pretreatment Program under the assumption that categorical standards will be enforced as outlined in the EPA regulations.
- . Briefing of the City-County Public Works Subcommittee is scheduled for January and will continue through the Spring as the ordinance is finalized.
- . We understand that EPA has approved your contract extension and that you will be forwarding to us documents which will up date our contract and establish the end date as the 22 month.
- . At our next monthly status meeting I would like to review each task report and its status and expected dates for return of comments so that the project team can finalize those reports.



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We look forward to reviewing these issues with you at our January monthly meeting and at that point hope to review the schedule for completing the project this Spring. I look forward to meeting with you and if you have any questions, please contact me.

Very truly yours,

PEAT, MARWICK, MITCHELL & CO.

Larry J. Scully, Senior Manager

cc: Richard Ripple, DPW
Allen McFearn, DPW
Susan Loudermilk, DPW
Dale Bertelson, DPW
Larry Russell, JMM

Chris Cain, JMM
Steve Gohman, EMS Labs
Deems Buell, PMM
John Wander, PMM
Jim Fagan, PMM

Pretreatment Study

City of Indianapolis -- Monthly Status Report for November 1982

Task 1 - Industrial Survey: Completed and waiting for City and EPA comments.

Task 2 - Notification Procedures: Completed and waiting for City and EPA comments.

Task 3 - Waste Characterization: JMM is waiting for comments on the revised Task 3 report prior to submitting it as final.

Task 4 - Technical Information: JMM is preparing revisions to Chapters 5 and 7 of the Task 4 report in response to comments received from the City and the TAC. These revisions will be issued to the City by the end of January. In particular the revisions and comments made at the TAC meeting on December 17, as well as comments made by the City staff at the Task 4 report meeting held in Indianapolis on December 27 and 28. Focus on the comments and the resulting revisions is on the values and basis for the industrial discharge limits proposed for the industrial waste ordinance, particularly regarding river and sludge impacts.

As was noted in the last monthly report, JMM has completed the entire field pilot plant program and POTW and river sampling program described in the plan of study and the pilot plant plan of operation. JMM has turned the pilot plant operation over to the City of Indianapolis, after removing the office trailer, completing an inventory of equipment, providing orientation and training for about 2 weeks for the City operators and assisting the City in winterizing the plant. JMM is checking with the City pilot plant operators several times during December and found that the City is successfully operating the plant and responding to the equipment problems that typically occur in pilot plants.

EMS Laboratories have removed their bioassay from the pilot plant site and completed the scope of work described in the pilot plant plan of operation and the plan of study except for followup work such as report corrections and support for meeting presentations.

- Task 5 - Ordinance Review: The Peat Marwick study team is revising the draft ordinance materials and incorporating the comments submitted by the State of Indiana.
- Task 6 - Funding: Funding and cost allocation options were reviewed with the technical advisory committee at the meeting on December 16.
- Task 7 - Personnel to Carry Out the Pretreatment Program: The personnel review is progressing and the current activity of the laboratory and the Industrial Surveillance Branch are being reviewed with Dale Bertelson.
- Task 8 - Self-Monitoring Report: The self-monitoring report requirements are being analyzed in conjunction with the Task 5 report and the Task 10 report which highlight the ordinance requirements and the noncompliance procedures.
- Task 9 - Sampling and Analysis: JMM has drafted the report on Indianapolis Pretreatment Monitoring Program and is in the process of correcting comments received from Peat Marwick. The report will be available for the City review at the meeting planned in March 27.
- Task 10 - Noncompliance Procedures: The draft noncompliance procedures are being reviewed with the City legal counsel and terminology differences between the Chamber of Commerce and the City are being reviewed.
- Task 11 - Monitoring Equipment Review: JMM has prepared a draft monitoring equipment report which will be available for the City near the end of January. This report will be combined with the reports on Task 9 and Task 12 in the monitoring program report.
- Task 12 - Laboratory Needs: JMM has prepared the draft of the Task 12 report and will be included in the monitoring program report due to the City in the end of January.
- Task 13 - Public Participation: Meetings were held with the City staff on December 15 and 16 and a meeting was held with the Chamber of Commerce Technical Advisory Committee on December 16. The final public hearings for the project is tentatively scheduled for April or May of 1983.

Task 14 - Joint Pretreatment: JMM has begun evaluating alternatives for joint industry action to achieve compliance with the discharge limits imposed in the Task 4 report. This report will discuss the economic and other impacts on industry which will result from the pretreatment program. The report will focus primarily on metal platers pretreatment and prevention of river impact due to CSO discharges.

Task 15 - Water Quality Model: JMM has begun drafting water quality report which will summarize results of the review of the impact on the White River, the sampling of the river as part of the pretreatment program, and a computer model run to document the fate of priority pollutants in the river. This report is due to be issued in February.

Task 16 - Technical Coordination: JMM met with the City of Indianapolis staff on December 16 and 17 and again on December 27 and 28 to discuss the technical basis for the industrial discharge limits. JMM also discussed the topic with the Chamber of Commerce on December 17.

Task 18 - Project Management: As noted earlier the City of Indianapolis is revising the contract documents and those will be forwarded to Peat Marwick and James Montgomery in January.